

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

LEK SECURITIES CORPORATION,
SAMUEL LEK,
VALI MANAGEMENT PARTNERS dba
AVALON FA LTD,
NATHAN FAYYER, and
SERGEY PUSTELNIK a/k/a SERGE
PUSTELNIK

Defendants.

17-CV-1789

**DEFENDANT AVALON'S
NOTICE OF MOTION FOR
PAYMENT OF EARNED LEGAL
FEES AND EXPENSES**

Please take notice that Avalon FA LTD ("Avalon") hereby respectfully moves this Court for an order requiring payment from funds frozen by this Court's March 10, 2017 Temporary Restraining Order to Avalon's legal counsel for unpaid attorney's fees and expenses incurred prior to the jury's verdict in this matter.

In support of the motion, Avalon incorporates by reference the supporting memorandum of law filed herewith.

For the reasons set forth in the documents filed herewith, Avalon respectfully requests that the Court enter an Order granting its Motion.

A handwritten signature in blue ink, appearing to read "J.M. Wines", with a horizontal line extending from the end.

Dated: April 10, 2020

James M Wines
SDNY Bar. No. JW5859
Law Office of James M Wines
1802 Stirrup Lane
Alexandria, VA 22308
202.297.6768
winesj@wineslegal.com